

Remarks

Claims 1-5, 8, and 11-28 are pending. Claims 6-7 and 9-10 are canceled in this Response.

Rejections Based On Savoie – all pending claims

All of the pending claims have been rejected as being obvious over Savoie (6,571,051).

A Server Programmed To Transmit An Image Editing Program And An Image Proxy To A Client.

Claim 1 has been amended to recite a server programmed to transmit an image editing program and an image proxy to a client. Savoie does not teach or suggest a server-client relationship of any kind, and more specifically Savoie does not teach or suggest a server-client relationship for editing an image proxy. Also, Savoie does not teach or suggest a server transmitting the editing programming to the client, whether along with or separate from the image proxy.

In Savoie, edit decisions for compressed (i.e., lower definition) video images are made on the so-called "off-line" computer 102 shown in Fig. 1 of Savoie. Computer 102 is not networked to a server. Computer 102 is a stand alone computer as shown in Fig. 1 and described in the accompanying text. Computer 102 is pre-programmed with the image editing program – there is no server programmed to transmit an image editing program to computer 102, as recited in Claim 1. Video images are supplied to computer 102 through a tape recorder 101 – there is no server programmed to transmit video images to computer 102, as recited in Claim 1. See Savoie, column 3, lines 18-54.

The Examiner asserts at page 3 of the Office Action that Savoie teaches a server in Fig. 3. This assertion is not correct. There is only one possible computer/processing unit in Savoie Fig. 3 – presumably "processing system 301" is referring to a computer/processing unit, although any such processing unit is not specifically called out in Fig. 3. All of the other components are peripheral devices under the control of processing system 301 – hard disc units 302, video monitor 303,

audio monitors 304, display unit 305, tape recorder 306, graphics tablet 307, stylus 308 and floppy disc drive 309. There is simply no server-client relationship shown in Savoie Fig. 3. See Savoie, column 4, line 55 through column 5, line 18.

Even if processing system 301 in Savoie might somehow be deemed a server, there is nothing in Savoie that suggests processing system 301 transmits an image editing programming to a client (or anywhere else).

If the Examiner disagrees with the Applicants' analysis of Savoie, he is respectfully requested to specifically point out those passages in Savoie that teach a server computer that transmits an image editing program and an image proxy to a client computer. Absent such a showing, the rejection of Claim 1 should be withdrawn.

For these same reasons, Claims 8, 18, and 24, which are means plus function, computer program and method counterparts to Claim 1, are also felt to distinguish patentably over Savoie.

Claims 2-5, 19-21 and 25-28 distinguish patentably over Savoie due to their dependence on Claims 1, 18 and 24, respectively.

A Client Programmed To Perform Image Edits And Upload Edit Commands To A Server.

Claim 11 has been amended to recite a network client programmed to perform image edits on an image proxy, generate commands corresponding to edits, and upload the commands to a server as a batch. As noted above, Savoie does not teach or suggest a network client, a server-client relationship of any kind or, more specifically, a client programmed to upload edit commands to a server, as recited in Claim 11. Claim 11, therefore, distinguishes patentably over Savoie.

For these same reasons, Claims 13, 16 and 22, which are means plus function, computer program and method counterparts to Claim 11, are also felt to distinguish patentably over Savoie.

Claims 12, 17 and 23 distinguish patentably over Savoie due to their dependence on Claims 11, 16 and 22, respectively.

Claim 14 recites a client for requesting a digital image to edit and a server for sending a proxy of the image in response to the client request. Claim 15 recites image editing programming for uploading commands on a network. Again, for all of the reasons noted above, Savoie does not teach or suggest the server-client relationship of Claim 14 or the network image editing programming of Claim 15.

All pending claims are now felt to be in condition for allowance. The foregoing is believed to be a complete response to the outstanding Office Action.

Respectfully submitted,

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